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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JEFFREY P. BENNETT, an individual,
12 Plaintiff,

13 v.

14 UNITED STATES OF AMERICA;
DOES I-X, inclusive; and ROE
15 CORPORATIONS I-X, inclusive,
16 Defendants.

CASE NO.: 2:20-cv-01584-GMN-DJA

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES [FIRST REQUEST]

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18 Plaintiff, JEFFREY P. BENNETT, by and through his attorneys of record, ADAM
19 R. FULTON, ESQ. and LOGAN G. WILLSON, ESQ. of the law firm of JENNINGS &
20 FULTON, LTD., and Defendant UNITED STATES OF AMERICA, by and through
21 CHRISTOPHER CHIOU, ESQ., United States Attorney, and SKYLER H. PEARSON,
22 ESQ., Assistant United States Attorney, hereby stipulate to extend the deadlines in the
23 current scheduling order and discovery plan in this matter for a period of 90 days for the
24 reasons explained herein. Pursuant to Local Rule IA 6-1, the parties hereby aver that this is
25 the first such extension requested in this matter.

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DISCOVERY COMPLETED TO DATE

1. The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures and supplemented their disclosures.

2. Plaintiff has served upon Defendant one (1) set written discovery consisting of Requests for Production of Documents, Requests for Admissions, and Interrogatories. Defendant has served its responses.

3. Plaintiff has served his second set of Requests for Production of Documents. Defendant has served its responses.

4. Defendant has served upon Plaintiff one (1) set of written discovery consisting of Requests for Production of Documents and Interrogatories. Plaintiff has served his responses.

5. On May 14, 2021, Defendant deposed Plaintiff.

**DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF
DISCOVERY**

Discovery to be completed includes:

1) Additional written discovery;

2) Depositions of Defendant's FRCP 30(b)(6) witness(es), Defendant's employee James Aliitaeao, Plaintiff's treating physicians, and relevant persons whose identities may be revealed through discovery;

3) Serving subpoenas;

4) Retaining and disclosing initial and rebuttal experts and completing expert depositions; and

5) Any discovery contemplated under the Federal Rules of Civil Procedure.

The parties aver, pursuant to Local Rule IA 6-1, that good cause exists for the requested extension. The parties agree that, pending this Court's approval, extension of

remaining discovery deadlines is appropriate, as the parties have diligently conducted discovery to date. Further, the parties further wish to investigate this case and potentially reach a resolution prior to incurring fees and costs for extensive further discovery and experts.

~~PROPOSED~~ NEW DISCOVERY DEADLINES

Discovery Cut-Off Date:	February 11, 2022
Amending Pleadings and Adding Parties:	November 15, 2021
Expert Disclosure Deadline:	December 16, 2021
Rebuttal Expert Disclosure Deadline:	January 13, 2022
Dispositive Motion Deadline:	March 15, 2022
Proposed Joint Pre-Trial Order:	March 15, 2022

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for the extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED: May 17, 2021

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JENNINGS & FULTON, LTD.

UNITED STATES ATTORNEY

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/s/ Skyler H. Pearson, Esq.
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 ASSISTANT UNITED STATES
 ATTORNEY
Attorneys for Defendant

IT IS SO ORDERED.



 UNITED STATES MAGISTRATE JUDGE

DATED: May 18, 2021
